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ADMITTED IN NEW YORK, VIRGINIA
AND THE DISTRICT OF COLUMBIA
OF COUNSEL

November 22, 2019

By ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

*Re: Chevron Corp. v. Steven Donziger, et al.;
Criminal Docket Number 19-561 (LAP);
Civil Docket Number 11-0691*

Dear Judge Preska:

On behalf of Steven Donziger, I respectfully submit this letter as a request that he be permitted to travel with his wife and son to the Boston area next week. He would drive to and from the Boston area and stay at a hotel. Needless to say, Mr. Donziger would provide Pretrial Services with all specific details of his trip in advance.

I have previously advised Ms. Glavin and Pretrial Services Officer Harmon that Mr. Donziger wishes to leave New York for Boston on November 27, 2019, in advance of Thanksgiving to visit family. I have also advised both of them that, if that request is granted, he also requests that he be permitted to leave on November 25, 2019, to accept a professor's invitation to lecture students at Harvard Law School on the morning of November 26, 2019. Mr. Donziger proposes to return on November 29, 2019, or possibly November 30, 2019.

Ms. Glavin reported in a letter filed last night that she expects to consent to Mr. Donziger's request to visit family if he provides Pretrial Services with detailed travel information, though she did not state a position on the entirety of his request. Meanwhile, Officer Harmon has advised me that the office policy of Pretrial Services is not to consent to overnight travel for defendants on electronic monitoring.

Now that Ms. Glavin has reported to the Court that she will not seek imprisonment of more than six months in this case, and for all the reasons previously stated, we request that the Court consider granting Mr. Donziger's pending request to eliminate electronic monitoring and home confinement on the parties' submissions. Alternatively, we request that the Court permit him to be released from electronic monitoring next week, either to leave November 27, 2019, to spend the holiday with family, or November 25, 2019, so he can also accept the invitation to speak to the law students at Harvard, with the monitoring to be resumed upon his return on November 29 or 30, 2019.

We appreciate the Court's consideration.

Respectfully submitted,

/s/

Andrew J. Frisch

cc: Ms. Rita Glavin
Special Prosecutor